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Attorneys for Defendants Oregon Department of Corrections, Oregon State Board Of Nursing,
Coffey, Davis, Digiulio, Kelly, Magee, Mccrae, Peters, Poole; Premo and Ridderbusch

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

DENNIS GINES,

Plaintiff,

v.

OREGON DEPARTMENT OF
CORRECTIONS (ODOC), a political
subdivision in charge of the Oregon State
Penitentiary (OSP); COLETTE PETERS,
Director, ODOC; C. DIGIULIO, Medical
Administrator, ODOC; BRANDON KELLY,
Superintendent, OSP; JEFF PREMO,
Superintendent, OSP; KEITH DAVIS, OSP
Food Services Manager; RICHARD
RIDDERBUSCH, OSP Assistant Food
Services Manager; CARRIE COFFEY, OSP
Health Services Manager; JULIE McCRAE,
OSP Health Services Nurse; BRENDA
MAGEE, OSP Health Services Nurse
Manager; OREGON STATE BOARD OF
NURSING (OSBN) a political subdivision of
the executive branch of the State of Oregon;
ROBERTA POOLE, OSBN Complaint Intake
Coordinator,

Defendants.

Case No. 6:17-cv-00841-SI

DECLARATION OF COUNSEL IN
SUPPORT OF MOTION TO EXTEND TIME

I, Robert E. Sullivan, hereby declare:

1. I am an attorney licensed to practice law in the State of Oregon and am an Assistant Attorney General for the State of Oregon.
2. I represent the individual defendants named in this case.
3. The current deadline for Defendants' Reply in Support of Motion for Summary Judgment [ECF Nos. 49, 64] is **January 18, 2019**. [ECF No. 67]
4. In addition, Plaintiff has filed a Third Amended Complaint, which is titled, "Motion for Leave to File Amended Complaint" [EFC No. 63], to which Defendants' Response is also due **January 18, 2019**. [ECF No. 67]
5. Defendants request an additional extension of **ten (10) days to Monday, January 28, 2019** to file responsive briefing.
6. Undersigned counsel was unexpectedly required for reserve duty (Oregon Air National Guard) for two days this week and continuing to Tuesday and Wednesday (Jan 22-23, 2019) of next week. Apologies to the Court for the inconvenience and to Plaintiff for the delay.
7. This request is made in good faith and not for the purposes of delay.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on January 18, 2019.

s/ Robert E. Sullivan
ROBERT E. SULLIVAN
Senior Assistant Attorney General

CERTIFICATE OF SERVICE

I certify that on January 18, 2019, I served the foregoing DECLARATION OF COUNSEL IN SUPPORT OF MOTION TO EXTEND TIME upon the parties hereto by the method indicated below, and addressed to the following:

DENNIS GINES

SID #12019691

Oregon State Penitentiary

2605 State Street

Salem, OR 97310-0505

Plaintiff Pro Se

 HAND DELIVERY

 X MAIL DELIVERY

 OVERNIGHT MAIL

 TELECOPY (FAX)

 E-MAIL

 E-SERVE

s/ Robert E. Sullivan

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Of Attorneys for Defendants Oregon Department
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Peters, Poole; Premo and Ridderbusch